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Clerk, U.S. District Court  
Anchorage, A.K.

Name Josette Auguiste  
Mailing address 3640 W Diamond Blvd #35  
City, State, Zip Anchorage Alaska 99502  
Telephone 907-538-7820

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

Josette Auguiste,  
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Providence Alaska,

Sam Sameth,

Laura Burger, Catherine Robinson  
(Enter full names of defendant(s) in this action.  
Do NOT use *et al.*)

Defendant(s).

Case No. 3:16-cv-00171-TMB  
(To be supplied by Court)

AMENDED  
COMPLAINT UNDER  
THE CIVIL RIGHTS ACT  
42 U.S.C. § 1983

(NON-PRISONERS)

**A. Jurisdiction**

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you assert jurisdiction under any different or additional authorities, please list them below:

**B. Parties**

1. Plaintiff: This complaint alleges that the civil rights of Josette Auguiste  
(print your name)

who presently resides at 3640 W Diamond Blvd #35 99502  
(mailing address)

were violated by the actions of the individual(s) named below.

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, Catherine Robinson is a citizen of Alaska, and is employed as a providence Alaska HR Recruiter  
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, Laura Burger is a citizen of Alaska, and is employed as a Supervisor of SPD  
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, Sam Sameth is a citizen of Alaska, and is employed as a Supervisor of SPD  
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

**C. Causes of Action** (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about Feb 11 - 2015, my civil right to

(Date)

due process

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Laura Burger supervisor

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

I call Laura on Feb 11-2015 at about 7:30 Am to discuss a violation with her in the process of the conversation she said HR wants to talk to me and to ask why. her reply you will ~~know~~ find out. since you always say we are unfair to you, I really wasn't worried since I know I didn't do anything wrong. I reported to her her one lead suit was morally open an secure area for some-one he didn't know since he said he was never to refer him to security when I got to the office Sam, Laura, and Catherine had me seated and within less than 5 minutes I was told I was insubordinate I try to explain what happen and Catherine said no more explanation, you are suspended for 3 days. I she said that I told her I rather give up my position instead of being punish for doing what is ~~right~~ right. she quickly said "you are fired, you are terminated" this is your resignation, I ask her I am not suppose to give you 2 week notice she said not in this case she voided it. Sam Sameth run out of the Room

Claim 2: On or about Feb 11-2015, my civil right to  
(Date)

due process

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Sam Gameth.

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

Sam ask me to take care of a stat for him since it was still washing in the machine & told the opportunity to make some Bumps. after that I stop to do the stat instrument. Document it in the data Base and hand it over to Botaine yatur to sterilize them. so after sam ask me to do cleaning, I should him on the list that I did it already. he said ok, what he did next is what violated my Rights, he wrote a report and turn it to Laura Bays stating that he ask me to do something and I refuse. I found out during the Feb 11 2015 meeting that what transpired. and he was saying when I ask you to do something you have to do it. all the info of our work is documented and he knew I did it because I sign the paper in his present infact he Brought the paper for me to sign. when Catherine Robinson said I am fired he Run out of the Run so fast I never saw him again that morning and the other never made an attempt to fine him. he run and hide



Claim 3: On or about Feb 11 2015, my civil right to  
Due Process.<sup>(Date)</sup>

(due process, freedom of religion, free speech, freedom of association and/or assembly, freedom from cruel and unusual punishment, etc. List only one violation.)

was violated by Catherine Robinson.  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

after the meeting. Catherine Escal me to the locker room and Laura too. she ask me if I need a TAXI pass I said no, Don't worry about me I am fine, worry about you self. while undressing the turn their back to give me privacy. I ~~see~~ shook Laura bad and with her well her face was red and her face looking down on the floor, couldn't look at me. I left, saying Bye to every one I meet along the way. next Day Feb 18<sup>th</sup> 2015 Catherine call wanting me to lied about my last day of work, saying tell unemployment my last day of work was the 2nd of Feb 2015 I told her this is falsey I not doing that. she hang up and 2 hours later she call back from the Ext. I said hello Catherine, This is not Catherine this is the Anchorage Police Department. I need to read you your Rights, Dont call no one in the Building you are not allow on the grounds, I said that where I pick up my meds and and just did my Blood work, send someone for it and my Blood work was mailed to me, and a Trespass followed latter. with a false police report in place. could not pick up my meds for my eyes.

#### D. Previous Lawsuits

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** \_\_\_\_\_ Yes \_\_\_\_\_ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_ Still pending

Issues Raised: \_\_\_\_\_

b. Lawsuit 2:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_ Still pending

Issues Raised: \_\_\_\_\_

#### F. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 950,000

2. Punitive damages in the amount of \$ \$80,000
3. An order requiring defendant(s) to be held responsible for  
their actions
4. A declaration that criminal activity took place
5. Other: \_\_\_\_\_
- Plaintiff demands a trial by jury. ☒ Yes ☐ No

### DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage on 10-16-16  
(Location) (Date)

Jesselle Auguste  
(Plaintiff's Original Signature)

\_\_\_\_\_  
Original Signature of Attorney (if any)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Attorney's Address and Telephone Number